

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARTHUR LEE JEFFERSON, aka SAV,
ANTHONY MAURICE CLARK, aka AMPP,
DARREN JEFFREY TOMLINSON,
CARTIER NYCOLE FITCH,
LEESHAWN ANTHONY MINTER, aka
MAN MAN,
JAMONTAE NELSON, aka SCOOT,
GREGORY COOPER, II,

Defendants.

INDICTMENT

1:24 CR 00210

CASE NO.

Title 18, United States Code,
Sections 922(g)(1), 924(a)(8),
and 1956(a)(1)(B)(i); Title 21,
United States Code, Sections
841(a)(1), (b)(1)(A), (b)(1)(B),
(b)(1)(C), 843(b), 846 and
856(a)(2)

JUDGE FLEMING

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,
21 U.S.C. §§ 846 and 841(a)(1))

The Grand Jury charges:

1. From on or about January 28, 2020, to on or about May 21, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants ARTHUR LEE JEFFERSON, aka SAV, ANTHONY MAURICE CLARK, aka AMPP, DARREN JEFFREY TOMLINSON, CARTIER NYCOLE FITCH, LEESHAWN ANTHONY MINTER, aka MAN MAN, JAMONTAE NELSON, aka SCOOT, and GREGORY COOPER, II, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to distribute and possess with intent to

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distribute mixtures and substances containing detectable amounts of fentanyl, cocaine, and marijuana. As to Defendant JEFFERSON, this Defendant conspired to distribute and possess with the intent to distribute at least 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A). As to Defendants CLARK and TOMLINSON, these Defendants conspired to distribute and possess with the intent to distribute at least 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and at least 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B). As to Defendants FITCH, MINTER, NELSON, and COOPER, these Defendants conspired to distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl and cocaine, both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. JEFFERSON and CLARK obtained quantities of cocaine from Columbus, Ohio, which they supplied to redistributors and customers who were part of the Drug Trafficking Organization (“DTO”) in the Summit County, Ohio, area.

B. MINTER obtained cocaine from Columbus, Ohio, and provided it to JEFFERSON for redistribution.

C. FITCH assisted JEFFERSON in delivering controlled substances to customers, collecting money for the sale of controlled substances, and storing controlled substances inside XXX Elizabeth Parkway, Akron, Ohio.

D. JEFFERSON, CLARK, and TOMLINSON used XXX Elizabeth Parkway, Akron, Ohio, to store and distribute controlled substances.

E. FITCH leased XXX Elizabeth Parkway, Akron, Ohio, for the purpose of storing and distributing controlled substances for JEFFERSON, CLARK, and TOMLINSON.

F. JEFFERSON, CLARK, and TOMLINSON obtained quantities of fentanyl from Indiana and Cleveland, Ohio, which they redistributed to redistributors and customers who were part of the DTO in the Summit County, Ohio, area.

G. NELSON distributed fentanyl to JEFFERSON, CLARK, and TOMLINSON, who redistributed the fentanyl to customers in the Summit County, Ohio, area.

H. COOPER assisted JEFFERSON by distributing controlled substances to customers, collecting drug proceeds on behalf of JEFFERSON, looking after the drug stash house at XXX Elizabeth Parkway, Akron, Ohio, and disposing of drug trafficking evidence for JEFFERSON by removing JEFFERSON's trash before trash collection so law enforcement would not have an opportunity to search disposed of trash for evidence of drug trafficking.

I. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls and sending and receiving text messages to communicate.

J. Conspirators, when using cellular telephones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, and code words and phrases to

obscure and disguise the true nature of their activities and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

4. On March 28, 2022, starting at approximately 6:54 p.m., JEFFERSON exchanged text messages with J.S. (an individual known to the Grand Jury but not indicted herein) on the telephone. J.S. asked, "Hey, can u bring 1 [gram of fentanyl]?" JEFFERSON replied, "I got you." After thanking JEFFERSON, J.S. wrote, "I sent you 80." JEFFERSON answered, "You still owe me 80 after today start paying on yo tab [drug debt] it's been a couple weeks now."

5. On March 28, 2022, at approximately 8:34 p.m., JEFFERSON sent J.S. a text message which read, "Outside."

6. On March 29, 2022, at approximately 9:41 p.m., JEFFERSON received an incoming phone call from COOPER. COOPER said, "Dude, I apologize. My f**king phone died." JEFFERSON answered, "You gonna have to come to the house, bro. I'm on my way home." COOPER replied, "I got 120, is that cool [\$120 drug purchase]?" JEFFERSON answered, "Yeah, that's cool."

7. On March 29, 2022, at approximately 9:55 p.m., JEFFERSON arrived at XXXX Wellspring Ave., North Canton, Ohio [JEFFERSON's residence].

8. On March 29, 2022, at approximately 10:18 p.m., JEFFERSON placed a phone call to CLARK. JEFFERSON asked, "Where you at, brody?" CLARK replied, "In the Heights." JEFFERSON asked, "You ain't catching no plays [drug sales] or nothing?" CLARK

replied, "Yeah." JEFFERSON indicated that he just laid down and did not want to meet his "wop" [drug customer] and asked if CLARK would do it. CLARK asked, "What you be charging?" JEFFERSON said, "70 a G [\$70 per gram]. You know what I'm charging." JEFFERSON advised his "play" [drug customer] would call CLARK.

9. On March 29, 2022, at approximately 10:19 p.m., COOPER arrived at XXXX Wellspring Ave., North Canton, Ohio, and entered the residence.

10. On March 29, 2022, at approximately 10:32 p.m., COOPER exited XXXX Wellspring Ave., North Canton, Ohio, and drove away.

11. On March 29, 2022, at approximately 10:47 p.m., JEFFERSON placed a phone call to CLARK. JEFFERSON asked, "I said, what you put on them joints [fentanyl] you got?" CLARK answered, "Half [amount of cutting agent]." JEFFERSON replied, "He [drug customer] tell me he said he wanted ten of them b***hes [10 grams of fentanyl]." CLARK asked, "Did you take 'em [fentanyl] to him?" JEFFERSON answered, "Yeah."

12. On March 31, 2022, at approximately 12:58 a.m., JEFFERSON placed a phone call to J.K. (an individual known to the Grand Jury but not indicted herein). JEFFERSON asked, "What you want?" J.K. answered, "600 [\$600 worth of fentanyl]."

13. On March 31, 2022, at approximately 12:59 a.m., JEFFERSON placed a phone call to J.S.. JEFFERSON asked, "What you want?" J.S. replied, "Ah, one and a half [1.5 grams of fentanyl]." JEFFERSON asked, "Did you send me some money already?" J.S. stated, "I sent you \$40, and I got the other here in cash." JEFFERSON questioned, "You sent me \$40?" J.S. replied, "Yeah." JEFFERSON said, "I ain't got no \$40 from you, [J.S.]." J.S. replied, "Alright, hold on, lemme check. No, I got it. I didn't send it yet, it's still in the thing. 'Cause I was

waiting to hear back from you, I forgot, that's why." JEFFERSON confirmed, "You said one and a half?" J.S. answered, "Yeah." JEFFERSON said, "Alright, send it."

14. On March 31, 2022, at approximately 1:00 a.m., JEFFERSON placed a phone call to COOPER. JEFFERSON asked, "What you want?" COOPER replied, "I want 40 [\$40 worth of fentanyl]." JEFFERSON replied, "Alright, come on."

15. On March 31, 2022, at approximately 1:08 a.m., JEFFERSON received a phone call from FITCH. JEFFERSON stated, "I'm waiting on GREG [COOPER]. I'm 'bout to pull up, hit . . . hit my dude [J.K.], then hit J.S., then I'm on my way to the crib." FITCH asked, "Where you at now?" JEFFERSON answered, "I'm at the apartment [XXX Elizabeth Parkway, Akron, Ohio]." FITCH replied, "Yeah, you doing too much." JEFFERSON said, "GREG [COOPER] here right now, babe. So, I'm gonna hit the road." FITCH again said, "You doing too much." JEFFERSON replied, "No, I gotta catch these plays [drug sales], I got rent tomorrow."

16. On March 31, 2022, at approximately 1:15 a.m., JEFFERSON departed from XXX Elizabeth Parkway, Akron, Ohio, and distributed \$600 of fentanyl to J.K.

17. On March 31, 2022, at approximately 2:48 p.m., JEFFERSON received a phone call from MINTER. MINTER said, "I'm here." JEFFERSON asked, "You got in, you went in already?" MINTER replied, "I'm already, I'm in here, in here." JEFFERSON said, "Go to the, um, you know where it's, in the freezer and s**t, put 10 on there [10 grams of cutting agent]." MINTER asked, "You said put 10 on there?" JEFFERSON answered, "Yeah, let me know, bag it [fentanyl] up and all that s**t and put everything away, then let me know when you're leaving out." MINTER agreed.

18. On March 31, 2022, at approximately 3:05 p.m., JEFFERSON received an incoming phone call from MINTER. MINTER said, "Now I'm coming down McKinley going, uh, you said it's the, it's the one on the right or the left?" JEFFERSON asked, "Where you coming from, Arlington?" MINTER replied, "Yup, so turn right, and then go in there and then make the left?" JEFFERSON stated, "All the way, all the way at the end there by Fuller, like, that first parking lot." After further discussion of the directions, JEFFERSON said, "Yeah, I'm about to tell him to come outside." MINTER said, "Yup." JEFFERSON replied, "700 [\$700 fentanyl sale]." MINTER asked, "Huh?" JEFFERSON again said, "700." MINTER replied, "Yup."

19. On April 1, 2022, at approximately 7:25 p.m., JEFFERSON placed a phone call to CLARK. During the call, CLARK stated, "Yeah, I put the word, I told you, I got, like, 37 left of that, that s**t that I had, I had in my car, you feel me?" CLARK added, "I put a one [portion of cutting agent] on that s**t, that s**t, that s**t work itself [drug quality]." JEFFERSON replied, "Bro, I ain't gonna lie, bro, that s**t, that s**t better than I thought it was, bro." CLARK said, "Man, bro, after he told me that, what he was doing, bro, I been stackin' a one [cutting agent] on everything, bro, f**k, what they been talkin' 'bout, bro. Ain't nobody [drug customers] say s**t to me." JEFFERSON replied, "I ain't had a complaint, I been doing it for n***as, and n***as put a one [cutting agent] on theirs, and they ain't said nothin'. They coming, they coming back [drug customers]." JEFFERSON added, "S**t cool and all that, but it'd better be if it's for like 60, 65 [\$60-\$65 per gram of fentanyl]."

20. On April 3, 2022, at approximately 12:36 a.m., JEFFERSON placed a phone call to MINTER. MINTER asked, "Where ya at now?" JEFFERSON replied, "At the, at the apartment [XXX Elizabeth Parkway, Akron, Ohio]." MINTER asked, "So do you got the

phone?" JEFFERSON answered, "Nope, he do." MINTER asked, "So how you gonna catch wops [drug customers] and he at home asleep?" JEFFERSON replied, "That's his problem."

21. On April 3, 2022, at approximately 3:35 p.m., CLARK placed a phone call to JEFFERSON. During the conversation, CLARK said, "Man, bro, I just had, like, nine, and nine cars [drug customers] out here when I pulled up." CLARK added, "Bro, s**t, I ain't got no f**king s**t [fentanyl]." JEFFERSON said, "Damn, bruh." CLARK went on, "I know, I had nine fu**in' people [drug customers]. I told everybody to leave. This s**t hot as f**k anyway [concerned about law enforcement]."

22. On April 3, 2022, at 4:29 p.m., JEFFERSON received a phone call from COOPER. COOPER stated, "I got, uh, 60 [\$60]." JEFFERSON said, "Gonna be a little bit, bruh."

23. On April 4, 2022, at approximately 6:52 p.m., JEFFERSON called CLARK. JEFFERSON asked, "Brodie, Unkie pull up?" CLARK replied, "Yeah, hell yeah." JEFFERSON said, "That n***a texted me and s**t." CLARK replied, "Ya, he pulled up on me before I went and made my run [drug sale]." JEFFERSON said, "I didn't even know that n***a had texted me." CLARK responded, "He had enough [fentanyl] for you, though." JEFFERSON replied, "Yeah, I know he did."

24. On April 6, 2022, at approximately 6:25 p.m., JEFFERSON called COOPER. COOPER said, "Hey, I got a hundred [\$100]." JEFFERSON replied, "I'll be back around 'bout 7:30."

25. On April 7, 2022, at approximately 6:29 p.m., JEFFERSON received a phone call from COOPER. COOPER said, "I got 120 [\$120]." JEFFERSON said, "Be downtown in the bottom [XXX Elizabeth Parkway, Akron, Ohio] in about 15 minutes."

26. On April 7, 2022, at approximately 6:37 p.m., JEFFERSON placed a phone call to TOMLINSON. JEFFERSON said, "Soon as action [drug supply] touch in a couple days and, s**t, I'm gonna have the rest of that little bread [drug debt] for you, the first day it touch [drug shipment arrival]." JEFFERSON went on, "I gotta get me a little dough, man. I got so many action plays [drug sales], I ain't with this waiting s**t." TOMLINSON replied, "That n***a Pher [C.T., an individual known to the Grand Jury but not indicted herein] called me for a kit [kilogram of cocaine] yesterday," and asked JEFFERSON, "What's the ticket on the kit [price for a kilogram of cocaine]?" JEFFERSON replied, "S**t, what I'm paying for it, 30 [\$30,000]." TOMLINSON replied, "Thirty, that s**t cheap as hell right now, that crazy, man. Watch a b***h a** drizzly [drug supply is low] come around this b***h." JEFFERSON responded, "It's cool. I'mma be tough enough when they do come, I'm probably gonna have one and a half, two of them b***ches [1.5 – 2 kilograms of cocaine]." TOMLINSON said, "Yeah, I already see it coming, there ain't, there ain't been no truck [drug supply] running around in the last couple days."

27. On April 8, 2022, at approximately 4:28 p.m., JEFFERSON received a phone call from D.C. (an individual known to the Grand Jury but not indicted herein) on the telephone. D.C. said, "S**t, need a g and half [1.5 grams of fentanyl]." JEFFERSON said, "Go down to the bottom, bro [XXX Elizabeth Parkway, Akron, Ohio]."

28. On April 9, 2022, at approximately 2:28 p.m., JEFFERSON and TOMLINSON had a conversation on the telephone. TOMLINSON stated, "The s**t I had coming in the mail yesterday, that s**t got knocked [believes parcel got intercepted or stolen]. I was mad as hell." JEFFERSON asked, "It got knocked, bro?" TOMLINSON replied, "Hell yeah. His [drug supplier] dumb a**. I'm like, bro, like, what. 'Cause I was tracking the s**t [tracking the

parcel], but I'm watching, the s**t is not moving." JEFFERSON asked, "What'd he say, what he gonna do?" TOMLINSON answered, "He talking about he gonna, he about to go grab some other s**t and send four pounds. Talking about it's gonna be cheaper, like, fourteen [\$1,400 per pound]." JEFFERSON replied, "Man, bro. Weed [marijuana] cheap right now, bro. It decent weed, like, good weed. Cheap, bro." JEFFERSON went on, "S**t cheap around here, bro. Ain't no way, sending them b***hes to you or not, bro. That s**t supposed to be cheaper, bro." TOMLINSON replied, "Yeah, I know it is, bro. He trying to get me 16 a P man [\$1,600 per pound of marijuana]."

29. On April 10, 2022, at approximately 7:05 p.m., JEFFERSON received a phone call from CLARK. CLARK asked, "Can you off [sell] this nine [grams of fentanyl] for me?" JEFFERSON responded, "Action [fentanyl]?" After CLARK agreed, JEFFERSON asked, "What you want for it?" After going back and forth, CLARK indicated he wanted eighty-five [\$85 per gram] for the drugs, stating, "You already know that b***h clean [uncut fentanyl]." JEFFERSON advised he would call CLARK back.

30. On April 10, 2022, at approximately 7:16 p.m., JEFFERSON placed a phone call to TOMLINSON. JEFFERSON asked, "Yeah, like, what you be taking out of nine [grams of fentanyl]?" TOMLINSON replied, "Like two and a quarter, two and a half." JEFFERSON responded, "That's with the good s**t [fentanyl] up outta there." TOMLINSON said, "You gonna make whatever off the nine, then that's, like, a free \$2,500 real quick. You know what I'm saying?"

31. On April 13, 2022, at approximately 9:31 a.m., JEFFERSON placed an outgoing phone call to CLARK. JEFFERSON asked, "That n***a T ain't got no action [fentanyl] down here, bro?" CLARK replied, "I think so, bro, yeah. He, I think it's at my house." JEFFERSON

said, "Man, tell T I need three zips [three ounces of drugs]." CLARK said, "Alright, I'm about to call him."

32. On April 13, 2022, at approximately 9:37 a.m., JEFFERSON placed a phone call to TOMLINSON. JEFFERSON asked, "Bro, what, bro, what can I put on 3 of them b***hes [three ounces of drugs]?" TOMLINSON asked, "A zip [ounce]?" TOMLINSON went on to say, "That's what I was doing, yeah, like, but, you know, on the soft [cocaine], I put the motherf**king, like, I'd turn two [ounces of cocaine] into three [ounces of cocaine]. Know what I'm saying? You can, you can probably do, like, three and a border [3.5 ounces of cocaine]. Or one [ounce of cocaine] and a border [1/2 ounce]." JEFFERSON asked, "You said you turned two into three?" TOMLINSON replied, "Right. You got three?" JEFFERSON answered, "Yeah. I'm trying to turn three into something." TOMLINSON said, "You probably can do one into, like, a border. Three, fifteen [cutting 3 ounces of cocaine to make a larger amount]."

33. On April 14, 2022, at approximately 5:22 p.m., JEFFERSON received a call from FITCH. FITCH asked, "What am I doing down here [XXX Elizabeth Parkway, Akron, Ohio]?" JEFFERSON replied, "It's in the freezer. Put, um, 20 g's [grams of fentanyl] on there. Ya hear me, babe?" FITCH replied, "Yeah." JEFFERSON added, "Twenty of 'em and take 'em [20 grams of fentanyl] to Bron [an individual known to the Grand Jury but not indicted herein]." FITCH agreed.

34. On April 14, 2022, at approximately 5:26 p.m., during a phone conversation between JEFFERSON and FITCH, FITCH stated, "I'm on my way to Bron's now."

35. On April 14, 2022, at approximately 5:31 p.m., during another phone conversation between JEFFERSON and FITCH, JEFFERSON stated, "Make sure you tell him

that's 20 g's [grams of fentanyl], whatever bread [drug payment] he got for you, like, \$1,500."

FITCH replied, "Alright."

36. On April 16, 2022, at approximately 10:04 p.m., JEFFERSON placed a phone call to NELSON. NELSON said, "I'm at the stew right now, I'm just saying, tomorrow try to figure that s**t out." JEFFERSON replied, "I grabbed some work tonight, too, already though." NELSON asked, "Grabbed what?" JEFFERSON answered, "Uh, mannie [Manitol, a cutting agent]." Later in the call, NELSON said, "I told them I was gonna wait 'til you got a read [drug quality] before we do the extra s**t." JEFFERSON replied, "May have one [drug quality test] tomorrow, bro. I'm try to get it, I'm go do it [mix drugs] tonight so I can have it tomorrow."

37. On April 17, 2022, at approximately 10:39 p.m., JEFFERSON called NELSON. NELSON asked, "What up, man, you been meaning to call me?" JEFFERSON replied, "Yeah bro, 4, 5 [amount of cutting agent] on that b***h, got a read of a 7, 8, bro [drug quality]." JEFFERSON went on, "I'm gonna get [unintelligible] in the morning see what he trying to do, if he trying to do the whole little 20 [20 grams], 20 drive or what he trying to grab, but he said he definitely gassing that s**t, too [adding cutting agent]." NELSON replied, "Alright, bet." JEFFERSON said, "I know he did that, I could back a little [drug potency] on my, my s**t, will keep slappin' [drug sales]." Later in the call, JEFFERSON said, "Ya'll no faking [drug quality]." NELSON responded, "Yeah, man. That's why I said let him know that s**t doin [drug quality], for real." NELSON went on, "Just give me 60 [\$60 per gram], for real." JEFFERSON agreed and said, "I'm gonna, uh, first thing in the morning, I'mma, um, what's his name, give me another one, and I'm gonna handle that for you and call you and, uh, drop that off to you, too [drug payment]."

38. On April 18, 2022, at approximately 11:30 a.m., JEFFERSON placed a phone call to CLARK. JEFFERSON said, "It's on. Eighty of them b***hes [80 grams of fentanyl]." After CLARK asked about the drugs, JEFFERSON added, "I'm the one who had them, bro, that's what I was tried to tell you yesterday." CLARK asked, "Oh, you got the b***hes [fentanyl]?" JEFFERSON replied, "Yeah, he [NELSON] left them with me, 'cause, you know he running around with that b***h, you feel me?" JEFFERSON went on, "They was at the apartment [XXX Elizabeth Parkway, Akron, Ohio], though. I'm down here now, I'm about to mix up [cut fentanyl], I'm 'bout to mix up the little s**t [fentanyl] I got from him, from the s**t. I didn't have to call him to go get 'em, 'cause they was down here [XXX Elizabeth Parkway, Akron, Ohio] the whole time." JEFFERSON added, "And, uh, catch me on Face Time."

39. On April 18, 2022, at approximately 9:32 p.m., JEFFERSON received a phone call from NELSON. NELSON said, "I got, um, like, 55 of it left [55 grams of fentanyl]." JEFFERSON replied, "Okay."

40. On April 19, 2022, at approximately 12:17 p.m., JEFFERSON placed a phone call to NELSON. JEFFERSON said, "When I get out I'm gonna come grab that s**t [fentanyl]."

41. On April 20, 2022, at approximately 11:04 a.m., JEFFERSON placed a phone call to NELSON. During the call, NELSON stated, "I'm waiting on you, for real." JEFFERSON replied, "S**t, for real, CARTY [FITCH] on her way down there and s**t. Pull up on her at the apartment [XXX Elizabeth Parkway, Akron, Ohio]." NELSON asked, "Where at, the apartment?" JEFFERSON replied, "Yeah."

42. On April 20, 2022, at approximately 11:12 a.m., JEFFERSON placed a phone call to FITCH, and during the call said, "I got SCOOT [NELSON] pulling down there. SCOOT about to give you something for me, too. Put it in the house." FITCH replied, "Alright."

JEFFERSON added, "When you, um, what's the name, um, like on your way there, looking on the highway and s**t. D**ks [law enforcement] and s**t on the highway. S**t, if it's, if it's hot [law enforcement are present], don't even bother." FITCH answered, "Alright."

43. On April 20, 2022, at approximately 11:32 a.m., JEFFERSON received an incoming phone call from FITCH. During the call, NELSON was with FITCH and spoke to JEFFERSON on the phone asking, "Hey, bro, where do you want me to put this s**t [fentanyl] at?" JEFFERSON replied, "Put it in the freezer." NELSON said, "It's already ready how you do it, though." JEFFERSON asked, "What you mean, like?" NELSON answered, "You want to press it back?" JEFFERSON asked, "No, I'm saying, I'm sayin, you said it's taking a what [drug ratio]?" NELSON answered, "It's still taking a bit, I swear on God, you can try it out yourself [drug potency]." JEFFERSON said, "Alright that's cool, just throw it in there then, I'mma handle it."

44. On April 21, 2022, at approximately 8:22 p.m., JEFFERSON received a phone call from CLARK. JEFFERSON said, "I'm about to bring you another [unintelligible] of that s**t [fentanyl], um, that bro dropped me off, so you can read [drug potency] and make sure it's the same s**t [drug quality]."

45. On April 21, 2022, at approximately 9:27 p.m., JEFFERSON placed a phone call to FITCH. JEFFERSON said, "Bae, move that glizzy [gun] from the side of the bed. Like, put that b***h, like, up in the closet." FITCH replied, "Alright." JEFFERSON added, "Like, on the side of the bed, on the floor. Laying up against the thing. It's, like, pushed back. Let's get it up off the floor." FITCH said, "Alright."

46. On April 21, 2022, at approximately 9:38 pm., JEFFERSON called COOPER. JEFFERSON said, "Come on to the bottom [XXX Elizabeth Parkway, Akron, Ohio]."

47. On April 21, 2022, at approximately 9:59 p.m., JEFFERSON called COOPER. JEFFERSON said, "When you get there, they going to give you a hundred in cash." COOPER agreed, and JEFFERSON added, "So don't forget to grab my money." COOPER replied, "Ok. I got you."

48. On April 21, 2022, at approximately 10:08 p.m., JEFFERSON received an incoming call from J.S. J.S. said, "Hey, I'm home." JEFFERSON replied, "My people [COOPER] be there in a minute. I'm going to Cash App you twenty dollars." J.S. asked, "Okay, just give them the hundred?" JEFFERSON said, "Yeah."

49. On April 22, 2022, at approximately 4:19 p.m., JEFFERSON received an incoming call from NELSON. NELSON asked, "You good on that s**t [fentanyl], though?" JEFFERSON replied, "Yeah, bro, I didn't even get into that bag [fentanyl supply] yet. I just pulled it. I hardened it up yesterday." JEFFERSON went on, "I put it in that press [kilogram press] yesterday, let it sit, and I just pulled it out last night and s**t, like, I'm 'bout to jump right on it [make drug sales]. You know, them got to look up to par [drug quality] to dump like that." NELSON said, "I got something for ya, ya feel me?" JEFFERSON replied, "I ain't even put that [existing fentanyl supply] out there yet." NELSON responded, "I got another, and you can, you can stretch [cut] out, too. I was trying to drop it off to ya." JEFFERSON replied, "I didn't even make, I didn't even [unintelligible] out bro, but I hope they doing what they saying they is [that the drug potency is as the supplier presented]."

50. On May 8, 2022, at approximately 2:25 p.m., JEFFERSON called MINTER. JEFFERSON asked, "You ain't got no wheels, do you?" MINTER replied, "No what's wrong?" JEFFERSON said, "Nothing, s**t, AMPP [CLARK] had told me to call you and see, uh, you, uh, shot to the Bus [Columbus] to grab something for him, talking 'bout he got a band [\$1,000]

for you.” MINTER answered, “S**t, I could be mobile right now.” JEFFERSON asked, “I’m saying, would the car make it to Columbus and s**t?” MINTER answered, “Yes.”

JEFFERSON said, “Alright, s**t he got a band [\$1,000] for you shoot down there and grab something. S**t, I’m about to, uh, T, you gonna grab it from T. I’m about to give T your number and have T call you.” MINTER said, “Okay, I’m ‘bout to call my people right now.”

51. On May 8, 2022, at approximately 2:43 p.m., JEFFERSON received a call from MINTER. MINTER said, “I already talked to bro, my peoples on they, she on her way to get me right now and then we about to go out there [Columbus] right now.” JEFFERSON replied, “I mean, that’s cool, you know what I’m saying, I just put the play down for you, put the money down for you.” MINTER said, “Oh, okay, I ain’t know who I couldn’t, okay, well, I’ll just call bro when I, uh, you know what I’m saying, I didn’t know who to call.” JEFFERSON added, “No, I’m saying, did the T call you?” MINTER said, “Yeah, I got T’s number, I didn’t know to call you or AMPP [CLARK].” JEFFERSON said, “Yeah, call T.” MINTER replied, “Okay, I already talked to T, so I’ll call him when I, when I’m finally down there.”

52. On May 10, 2022, at approximately 7:35 p.m., JEFFERSON received a call from D.C. D.C. said, “S**t, need one and a half [1.5 grams of fentanyl].” JEFFERSON replied, “I’ll be down to the bottom [XXX Elizabeth Parkway, Akron, Ohio] in, like, 25 minutes.”

53. On May 10, 2022, at approximately 7:49 p.m., JEFFERSON arrived at XXX Elizabeth Parkway, Akron, Ohio.

54. On May 13, 2022, at approximately 10:04 a.m., COOPER called JEFFERSON. JEFFERSON asked, “You thought that s**t [fentanyl] was a little stronger last night?” COOPER replied, “Um, seemed kind of the same [drug potency] to me.” JEFFERSON said, “Yeah, I put some booster [additional fentanyl] in there, too.”

55. On May 13, 2022, at approximately 6:18 p.m., JEFFERSON placed a phone call to an Unknown Male (UM). During the call, JEFFERSON stated, "I'm at the spot right now." The UM replied, "S**t, I'll grab 2 and a half them b***hes [2.5 ounces of fentanyl]." JEFFERSON said, "Alright. I'm gonna call and let you know where to pull up to."

56. On May 13, 2022, at approximately 6:19 p.m., JEFFERSON placed a phone call to CLARK. During the call, JEFFERSON said he had a "two and a half zip play [2.5 ounce fentanyl sale] I'm trying to hit."

57. On May 14, 2022, at approximately 10:04 p.m., JEFFERSON called COOPER. JEFFERSON directed COOPER, "Go to the bottom [XXX Elizabeth Parkway, Akron, Ohio]. I'll be there in, like, . . ." COOPER agreed, and JEFFERSON added, "You gotta make a run, you gotta make a run for me, though, since I'm about to give you some dope [fentanyl]." COOPER said, "Yeah, that's cool, alright."

58. On May 18, 2022, at approximately 11:29 p.m., JEFFERSON placed an outgoing phone call to CLARK. During the conversation, JEFFERSON stated, "Yeah, I just talked to T, bro, like an hour ago." CLARK asked, "He got another one [kilogram of cocaine]?" JEFFERSON said, "Yeah, he got another one for me." CLARK said, "You better grab yo s**t, 'cause he knows T's leaving, he leave on Sunday." JEFFERSON said, "It's only Wednesday, bro, I'm prolly gonna send the [unintelligible] out Friday or something." JEFFERSON and CLARK then discussed the best days of the week to have the drug couriers travel.

59. On May 19, 2022, at approximately 10:05 p.m., JEFFERSON placed an outgoing call to FITCH. JEFFERSON said, "I'm on my way down here to the bottom [XXX Elizabeth Parkway, Akron, Ohio] right now, I got a couple more plugs [drug deals] to hit." JEFFERSON added, "I only got, like, 30 g's [30 grams] left, I'm about to blow through the rest of these

b***hes.” JEFFERSON went on, “I’m trying to figure out when I’m about to send, um, send MAN MAN [MINTER], I gotta send him down, down to the plug [send to Columbus to meet drug supplier].”

60. On May 20, 2022, at approximately 12:02 a.m., JEFFERSON placed an outgoing phone call to MINTER. JEFFERSON asked, “When you wanna bust that move [pick up drugs from Columbus]?” MINTER replied, “Whenever. Whenever you need me to.” MINTER added, “There’s money involved. When does it need to be done? Tomorrow? Right now? Or what?” JEFFERSON replied, “Lemme see something. I might, could be done right now. Hold on, let me see something.”

61. On May 20, 2022, at approximately 6:14 p.m., JEFFERSON placed an outgoing phone call to MINTER. JEFFERSON said, “Hey, go to the house [XXXX Wellspring Ave., North Canton, Ohio] and s**t. CARTY [FITCH] out there, she gonna get that bread [money].” MINTER replied, “I was just about to say, I’m on my way there. I’m out here at the gas station pumping gas.” JEFFERSON said, “Alright, call me when you get there.”

62. On May 20, 2022, at approximately 6:47 p.m., MINTER arrived at XXXX Wellspring Ave., North Canton, Ohio, and left after 10 minutes.

63. On May 20, 2022, at approximately 6:31 p.m., JEFFERSON placed a phone call to CLARK. JEFFERSON said, “I’m about to go meet your broke-ass uncle, man.” JEFFERSON continued to discuss the fentanyl supplier known as “Unc,” stating, “I’ll have another \$4,000 for you after these zips [ounces of drugs] gone, the one zips that I gave Bron. Yeah, after that, don’t call me no more, bro, ‘til you come with some better prices.” CLARK responded, “Or some f**king better action [higher quality fentanyl].” JEFFERSON added,

“Better s**t and better prices, bro.” CLARK said, “Yeah, bro, he just f**king up all over the board. Like, bro, you be just wasting my time.”

64. On May 20, 2022, at approximately 8:02 p.m., TOMLINSON called JEFFERSON. JEFFERSON said, “I’m going down to the apartment [XXX Elizabeth Parkway, Akron, Ohio], and, s**t, I had to catch my play [make drug sale]. I’m still catching plays, my dude [fentanyl supplier] on his way, though. You don’t have to be in no rush or something, I’m about to go down here, I still got two more plays.” TOMLINSON replied, “Alright, so I’m gonna grab it, I ain’t know what we were doing.”

65. On May 21, 2022, at approximately 12:03 a.m., JEFFERSON called FITCH. JEFFERSON asked, “Where he at? Let me talk to him.” FITCH put MINTER on the phone, and JEFFERSON asked, “Bro. Where you, um, where you put it at?” MINTER replied, “This first cabinet at the top right here in this black basket at the top.” JEFFERSON said, “Alright, that’s cool.”

66. On or about May 21, 2022, JEFFERSON possessed a Glock, model 23, .40 caliber handgun bearing serial number WTY969, and ammunition at XXXX Wellspring Ave, North Canton, Ohio.

67. On or about May 21, 2022, JEFFERSON and FITCH possessed approximately 928.6 grams of a mixture and substance containing a detectable amount of cocaine, at XXXX Wellspring Ave., North Canton, Ohio.

68. On or about May 21, 2022, JEFFERSON and FITCH possessed \$7,000 of drug proceeds at XXXX Wellspring Ave., North Canton, Ohio.

69. On or about May 21, 2022, JEFFERSON and FITCH possessed approximately 179.2 grams of a mixture and substance containing a detectable amount of fentanyl at XXX Elizabeth Parkway, Akron, Ohio.

70. On or about May 21, 2022, JEFFERSON and FITCH possessed approximately 10.36 grams of a mixture and substance containing a detectable amount of cocaine at XXX Elizabeth Parkway, Akron, Ohio.

71. On or about May 21, 2022, JEFFERSON and FITCH possessed \$11,368 of drug proceeds at XXX Elizabeth Parkway, Akron, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

The Grand Jury further charges:

72. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendants ARTHUR LEE JEFFERSON, aka SAV, ANTHONY MAURICE CLARK, aka AMPP, and DARREN JEFFREY TOMLINSON did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

73. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant CARTIER NYCOLE FITCH did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

The Grand Jury further charges:

74. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendants ARTHUR LEE JEFFERSON, aka SAV, ANTHONY MAURICE CLARK, aka AMPP, DARREN JEFFREY TOMLINSON, and CARTIER NYCOLE FITCH did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

75. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant ARTHUR LEE JEFFERSON, aka SAV, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 6

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

The Grand Jury further charges:

76. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant CARTIER NYCOLE FITCH did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 7

(Maintaining a Premises for the Purpose of Drug Trafficking, 21 U.S.C. § 856(a)(2))

The Grand Jury further charges:

77. From on or about November 24, 2021, to on or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendants ARTHUR LEE JEFFERSON, aka SAV, ANTHONY MAURICE CLARK, aka AMPP, and CARTIER NYCOLE FITCH did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee and agent, namely a premises located on XXX Elizabeth Parkway, Akron, Ohio, and did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, the premises located on XXX Elizabeth Parkway, Akron, Ohio, for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely fentanyl and cocaine, Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 8

(Maintaining a Premises for the Purpose of Drug Trafficking, 21 U.S.C. § 856(a)(2))

The Grand Jury further charges:

78. From on or about November 24, 2021, to on or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendants ARTHUR LEE JEFFERSON, aka SAV, and CARTIER NYCOLE FITCH did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee and agent, namely a premises located on XXXX Wellspring Ave., North Canton, Ohio, and did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, the premises located

on XXXX Wellspring Ave., North Canton, Ohio, for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely fentanyl and cocaine, Schedule II controlled substances, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 9

(Felon in Possession of a Firearm, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

79. On or about May 21, 2022, in the Northern District of Ohio, Eastern Division, Defendant ARTHUR LEE JEFFERSON, aka SAV, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Trafficking in Heroin, on or about October 17, 2014, in Case Number CR 2014 05 1563(A), in the Summit County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Glock, model 23, .40 caliber handgun bearing serial number WTY969, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNTS 10-22

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

80. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Count	Defendant(s)	Date	Time (EST)
10	ARTHUR LEE JEFFERSON, aka SAV; ANTHONY MAURICE CLARK, aka AMPP	3/29/2022	10:18 p.m.

11	ARTHUR LEE JEFFERSON, aka SAV; GREGORY COOPER, II	3/31/2022	1:00 a.m.
12	ARTHUR LEE JEFFERSON, aka SAV; CARTIER NYCOLE FITCH	3/31/2022	1:08 a.m.
13	ARTHUR LEE JEFFERSON, aka SAV; LEESHAWN ANTHONY MINTER, aka MAN MAN,	3/31/2022	2:48 p.m.
14	ARTHUR LEE JEFFERSON, aka SAV; DARREN JEFFREY TOMLINSON	4/7/2022	6:37 p.m.
15	ARTHUR LEE JEFFERSON, aka SAV; CARTIER NYCOLE FITCH	4/14/2022	5:22 p.m.
16	ARTHUR LEE JEFFERSON, aka SAV; JAMONTAE NELSON, aka SCOOT	4/17/2022	10:39 p.m.
17	ARTHUR LEE JEFFERSON, aka SAV; ANTHONY MAURICE CLARK, aka AMPP	4/18/2022	11:30 a.m.
18	ARTHUR LEE JEFFERSON, aka SAV; GREGORY COOPER, II	4/21/2022	9:59 p.m.
19	ARTHUR LEE JEFFERSON, aka SAV; JAMONTAE NELSON, aka SCOOT	4/22/2022	4:19 p.m.
20	ARTHUR LEE JEFFERSON, aka SAV; LEESHAWN ANTHONY MINTER, aka MAN MAN,	5/8/2022	2:25 p.m.
21	ARTHUR LEE JEFFERSON, aka SAV; GREGORY COOPER, II	5/13/2022	10:04 a.m.
22	ARTHUR LEE JEFFERSON, aka SAV; DARREN JEFFREY TOMLINSON	5/20/2022	8:02 p.m.

All in violation of Title 21, United States Code, Section 843(b).

COUNTS 23-40
(Money Laundering, 18 U.S.C. § 1956(a)(1)(B)(i))

The Grand Jury further charges:

81. On or about the dates below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ARTHUR LEE JEFFERSON, aka SAV, did knowingly conduct and cause to be conducted financial transactions affecting interstate commerce, those being the deposit of U.S. Currency into JPMorgan Chase Bank account ending in #8575. Defendant did so knowing that the transactions were designed in whole or in part to conceal and disguise the nature, source, ownership, and control of the proceeds of a specified unlawful activity, that is: conspiracy to distribute and to possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, each financial transaction constituting a separate count as set forth below:

Count	Date	Amount of Currency Deposited
23	03/05/2021	\$1,900.00
24	03/08/2021	\$1,100.00
25	04/19/2021	\$1,020.00
26	05/03/2021	\$1,340.00
27	05/21/2021	\$1,000.00
28	06/02/2021	\$1,100.00
29	06/03/2021	\$1,500.00
30	06/10/2021	\$1,200.00
31	06/10/2021	\$1,300.00
32	06/16/2021	\$1,900.00
33	06/19/2021	\$2,000.00
34	06/21/2021	\$1,465.00
35	07/01/2021	\$1,600.00
36	07/13/2021	\$1,250.00
37	07/17/2021	\$1,200.00
38	11/19/2021	\$1,000.00
39	02/18/2022	\$1,800.00

40	05/09/2022	\$1,800.00
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All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

FORFEITURE

The Grand Jury further charges:

82. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 (drug offenses), Title 18, United States Code, Section 924(d)(1), Title 28, United States Code, Section 2461(c) (firearms offenses), and Title 18, United States Code, Section 982 the allegations of Counts 1 through 40, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendants ARTHUR LEE JEFFERSON, aka SAV, ANTHONY MAURICE CLARK aka AMPP, DARREN JEFFREY TOMLINSON, CARTIER NYCOLE FITCH, LEESHAWN ANTHONY MINTER, aka MAN MAN, JAMONTAE NELSON, aka SCOOT, and GREGORY COOPER, II, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly, as the result of the drug offenses charged herein; any and all of their property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the drug offenses charged herein; any property involved in or used in violation of the money laundering violations charged herein; and, (iii) any and all firearms and ammunition involved in or used in the commission of the firearms offenses charged herein; including, but not limited to, the following:

- a. Glock, model 23, .40 caliber handgun bearing serial number WTY969, seized on May 21, 2022, pursuant to the execution of a search warrant at the North Canton, Ohio, residence of ARTHUR LEE JEFFERSON.

- b. \$7,000 seized on May 21, 2022, pursuant to the execution of a search warrant at the North Canton, Ohio, residence of ARTHUR LEE JEFFERSON and CARTIER NYCOLE FITCH.
- c. \$11,368 seized on May 21, 2022, pursuant to the execution of a search warrant at XXX Elizabeth Parkway, Akron, Ohio, seized from ARTHUR LEE JEFFERSON and CARTIER NYCOLE FITCH.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.